

REMARKS

Claims 1-34 are pending. By this response, claims 1, 11, 16, 21, 24 and 27 are amended. Reconsideration and allowance based on the above-amendments and following remarks are respectfully requested.

Claims 1 and 16

The Office Action rejects claims 1-4, 6-10, 16-17 and 20 under 35 U.S.C. §103(a) as being unpatentable over Joshi, et al. (US 6,006,017) in view of Callaway, et al. (US 6,275,500); claims 3, 4 and 18 under 35 U.S.C. §103(a) as being unpatentable over Joshi, Callaway and Ilg (US 4,829,297); and claims 5 and 19 under 35 U.S.C. §103(a) as being unpatentable over Joshi, Callaway and Davis (US 4,363,093). These rejections are respectfully traversed.

Joshi teaches a system in which a primary station 10 is configured to transmit data to one or more secondary stations. The secondary stations are identified in Joshi as action secondary stations or unresponsive secondary stations. See column 6, lines 27-40. The primary station can control which secondary station in an unresponsive secondary station may have access to an upstream channel 20. See column 7, lines 42-48.

Nowhere in Joshi does it teach or suggest the use of an output type secondary station and an input type secondary station, as recited in independent claims 1 and 16. The unique system of applicant's embodiment employs a primary station and the use of output type and input type secondary stations by the primary station. These particular features are not taught in Joshi. Joshi merely teaches the use of secondary stations that are active or those that are unresponsive.

Thus, Joshi fails to teach or suggest, *inter alia*, wherein the refresh request is a request to an output type secondary station to output data external to the system, the output type secondary station being designated to output data from the system, where the synchronization request is a request to an input type secondary station to prepare data, and the polling request is a request to an input type secondary station to send data to the primary station, the input type secondary station being designated to prepare and input data to the primary station, as recited in independent claims 1 and 16.

Further, Callaway fails to remedy Joshi's deficiencies. Callaway teaches a master device which is able to poll and communicate with a plurality of slave devices. Callaway does not teach or suggest a system employing an output and input type secondary stations in conjunction with a primary station, as defined by the embodiments recited in independent claims 1 and 16.

Therefore, the combination of Joshi and Callaway fails to teach each and every feature of independent claims 1 and 16 as required.

Further, Ilg and Davis fail to remedy the deficiencies of Joshi and Callaway.

Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Claims 11, 21 and 24

The Office Action rejects claims 11-15, 21, 23, 24 and 26 under 35 U.S.C. §102(b) as being anticipated by Ilg, et al. (US 4,829,297) and claims 22 and 25 under 35 U.S.C. §103(a) as being unpatentable over Ilg in view of Callaway (US 6,275,500). These rejections are respectfully traversed.

Ilg teaches a system in which a master station periodically polls a plurality of remote stations. The remote stations are assigned to one of two groups. These two groups are designated based on the type of data they send. The first group is a plurality of stations which relay urgent information to the master. The second group consists of a plurality of non-priority stations. The non-priority stations handle non-urgent data sent to the master. See column 2, lines 20-32.

Ilg, however, fails to teach, *inter alia*, wherein the refresh request is a request to an output type secondary station to output data external to the system, the output type secondary station being designated to output data from the system, and the polling request is a request to an input type secondary station to send data to the primary station, the input type secondary station being designated to prepare and input data to the primary station, as recited in independent claims 11, 21 and 24.

Ilg teaches polling to assigned groups of remote stations. These two groups are based on the types of data they transmit. These two groups are not an output type or an input type secondary station as defined in the embodiments of claims 11, 21 and 24.

The Office Action alleges that column 3, lines 35-48 and column 4, lines 26-32 of Ilg teaches an output type and input type secondary station as claimed. Applicants respectfully submit this section of Ilg merely teaches the use of programmable controller 40 (master) with numerous program execution modules 44 (remote stations). Input/output modules 45 are used to allow the program execution modules 44 to execute programs for the controller 40. These

input/output modules act as an intermediary between the master controller and the remote stations. They are not remote stations from which data is polled by the master controller 40.

Further, even if they could be considered as a remote station, which applicants contend they cannot, the individual modules act to both input and output data between a remote station and the master. They are not individually designated as an output or input type nor do they perform the claimed features of outputting data from the system and preparing and inputting data to the primary station.

Thus, Ilg fails to teach each and every feature of independent claims 11, 21 and 24 as required. Further, Callaway fails to make up for Ilg's deficiencies. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Claim 27

The Office Action rejects claims 27-34 under 35 U.S.C. §103(a) as being unpatentable over Ilg (US 4,829,297) in view of Gilbert, et al. (US 5,297,144). This rejection is respectfully traversed.

As discussed above with regard to independent claims 11, 21 and 24, Ilg teaches polling two assigned groups of remote stations, the groups being assigned based on the types of data they transmit. These two groups are not an output type or input type station as recited in independent claim 27. The arguments with respect to independent claims 11, 21 and 24 apply to independent claim 27.

Specifically, Ilg fails to teach or suggest, *inter alia*, one or more input type secondary stations each configured for preparing data for transfer in a response to synchronization request from a primary station and configured for transferring the prepared data to the primary station in response to a polling request from the primary station; and one or more output type secondary stations each configured for preparing and transferring data externally from the system and sending an acknowledgment to the primary station in response to a refresh request from the primary station, as recited in independent claim 27.

Further, Gilbert fails to make up for the deficiencies of Ilg. Gilbert is provided to teach the use of a synchronization request from a primary station to secondary stations. Gilbert does not teach the use of two separating distinct output type secondary stations and input type secondary stations, let alone in the manner recited in claim 27.

Therefore, in view of the above, the combination of Ilg and Gilbert fail to teach each and every feature of claim 27. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Conclusion

For at least these reasons, it is respectfully submitted that claims 1-34 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings (Reg. No. 48,917)

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at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.


If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Dated: August 4, 2005

Respectfully submitted,

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2565-0221P

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